



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection
P.O. Box 402
Trenton, NJ 08625
(609) 292-2885
(609) 292-7695 (Fax)

Robert C. Shinn, Jr.
Commissioner

June 25, 1998

The Honorable Joseph Vas, Mayor
City of Perth Amboy
260 High Street
Perth Amboy, N.J. 08861

Dear Mayor Vas:

Re: Your Letter of June 3, 1998, Metals Surface Water Contamination
Runyon Watershed, CPS/Madison Site, Old Bridge Township

This is in response to your letter of June 3, 1998 and the attached letter from your consultant, Killam Associates, dated June 1, 1998 concerning metals contamination in Pricketts Brook related to the Madison Industries site. These issues were raised to the case manager in a letter from Killam dated March 27, 1998 and a response letter was issued on May 7, 1998. The Department stands by its previous response and would like to provide you with further information with regards to your consultant's concerns.

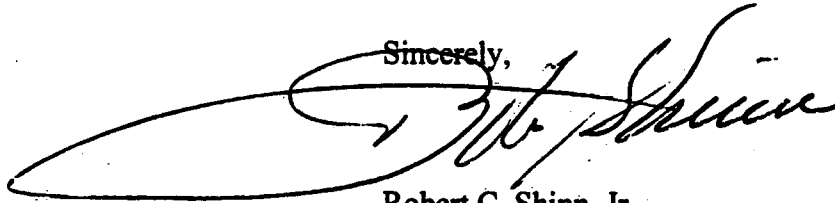
The statement that "metals continue to be discharged into the Watershed by Madison" is misleading. Madison does not have any direct discharges to the brook. Historic spills and leaks have contaminated the ground water and the highest concentrations found during the remedial investigations conducted by Madison were at the brass plant loading dock in the shallow ground water. This area is immediately upgradient of Pricketts Brook. Until the completion of the remedial investigations, it was not known exactly where the contaminated ground water was entering the brook. It was also discovered that during periods of rainfall, ground water levels rise and intercept the bottom of the brook and create a discharge of ground water to the surface water. As a result of this discovery, the Department required Madison to design and construct a system to capture the metals before they could enter the brook. This system, designated RS-1, was turned-on in February, 1997. Furthermore, as discussed in the May 7 letter, an additional shallow ground water recovery system (RS-2) has been designed and is being constructed over the next several weeks. Contrary to Killam's letter, Pricketts Brook is approximately 50 feet from RS-2 and not 250 feet. Apparently, Killam failed to take into account the 90 degree left turn that the brook makes just downgradient of the Madison fence line. Pumping at RS-2 will reduce concentrations in Pricketts Brook.



The Department disagrees with the assertion that "there has been no significant improvement in water quality with respect to metals". Enclosed with this letter are graphs of zinc concentrations at Pricketts Brook sampling location SW-2 (Madison fence line) since the on-set of pumping at RS-1 to present. Also graphed are the concentrations at this location over the last two-year period and from September, 1997 to present. The Department would like to point-out that the Killam graphs started in December, 1993 and ended with the September, 1997 data. The choice of this start-point (an anomalous data point almost three orders of magnitude below other data points from this time period) and end-point (excluding the most recent quarterly samples which show significant improvement) was designed to skew the graph. Re-plotting the data excluding the December, 1993 anomalous datum (7 ppb) results in a decreasing trend. As you can see by our updated graphs and trend lines, excellent progress is being made in reducing contaminant levels. In fact, the last zinc concentration above 5 mg/l (the MCL for zinc) at this location was January 15, 1998.

After your review of this letter and your reevaluation of the Killiam conclusions in light of the information provided above, a meeting to discuss any lingering concerns can be arranged with Assistant Commissioner Gimello. Please contact him directly if you have any further questions at (609) 292-1250.

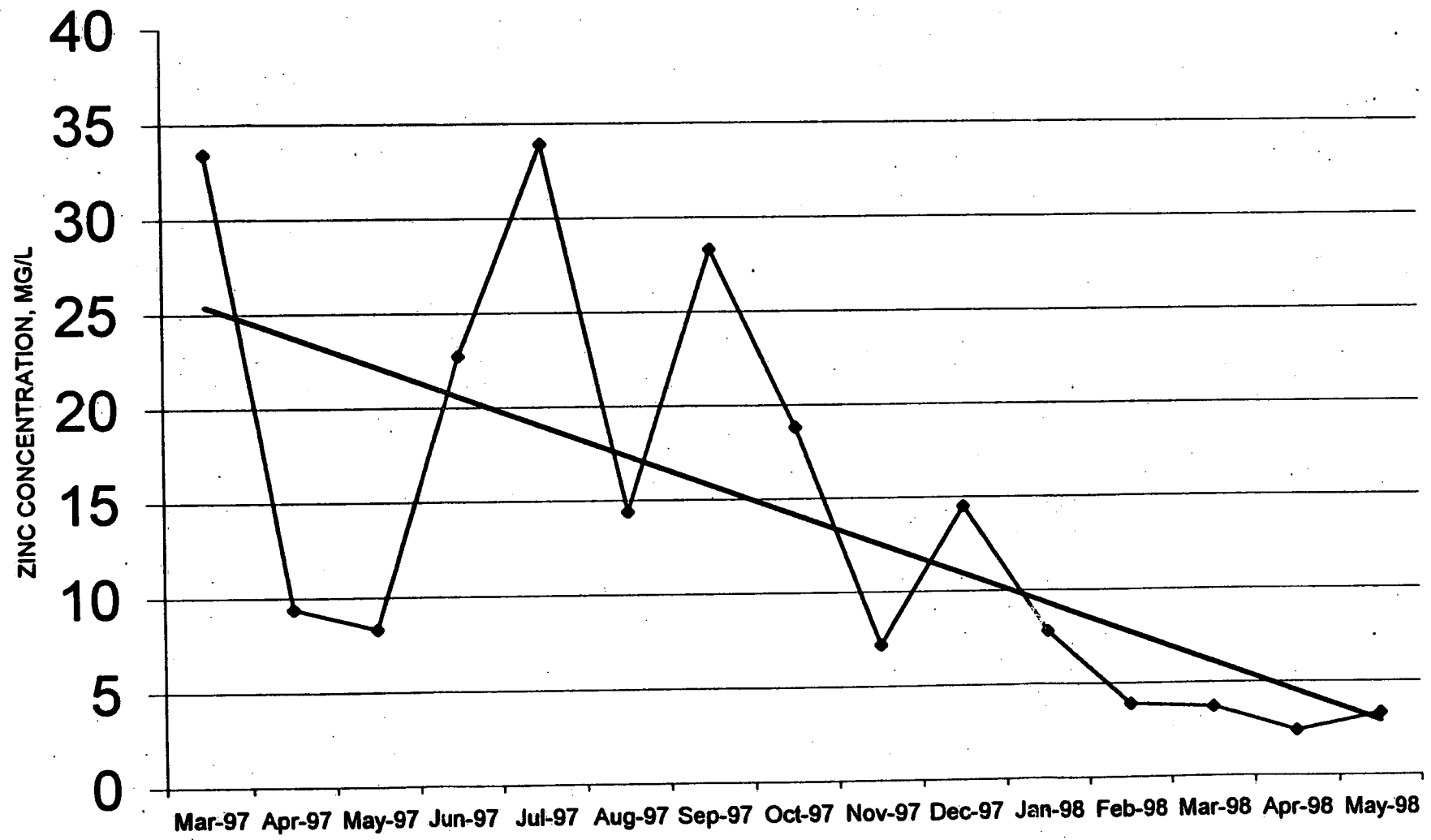
Sincerely,

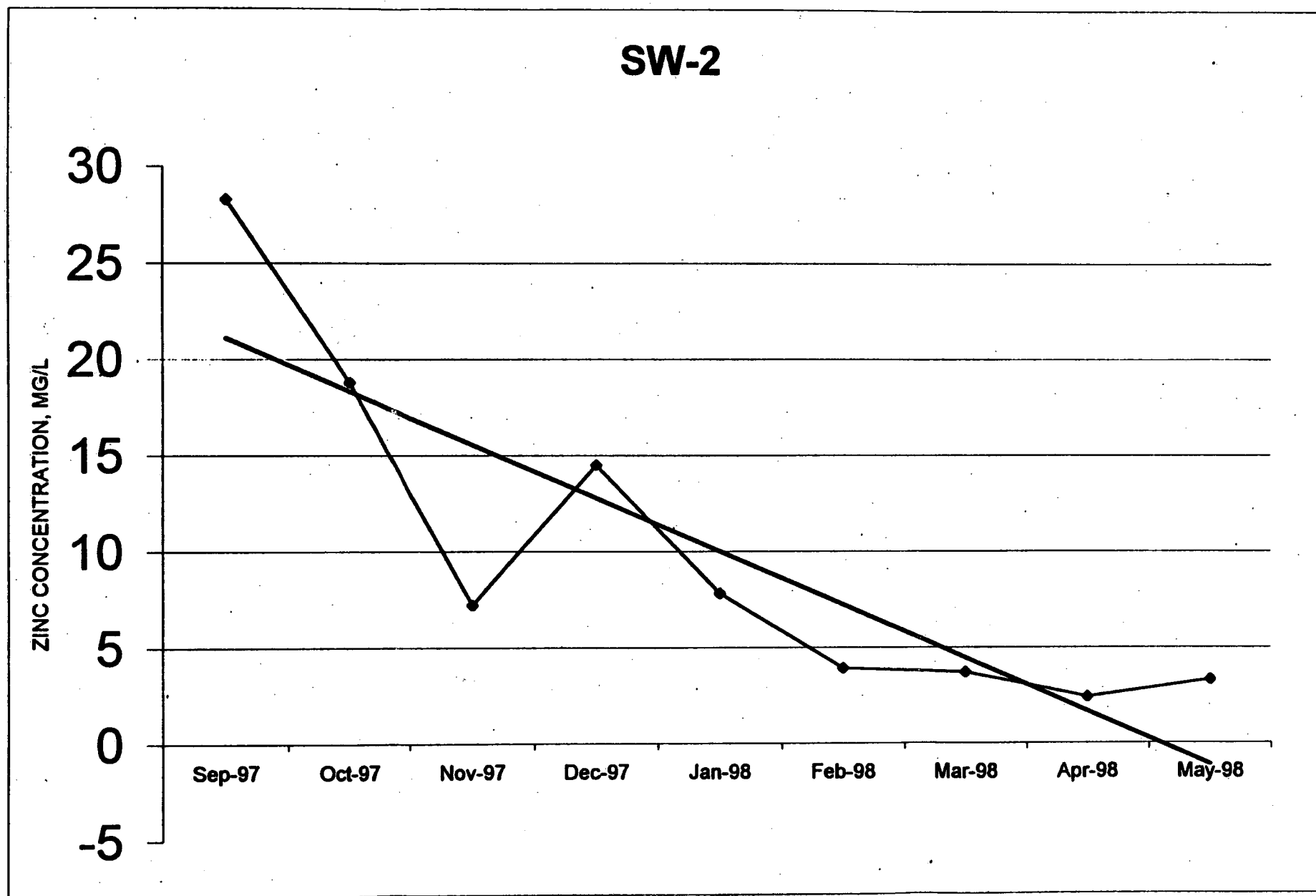
A large, stylized handwritten signature in dark ink, appearing to read "R. Shinn".

Robert C. Shinn, Jr.
Commissioner

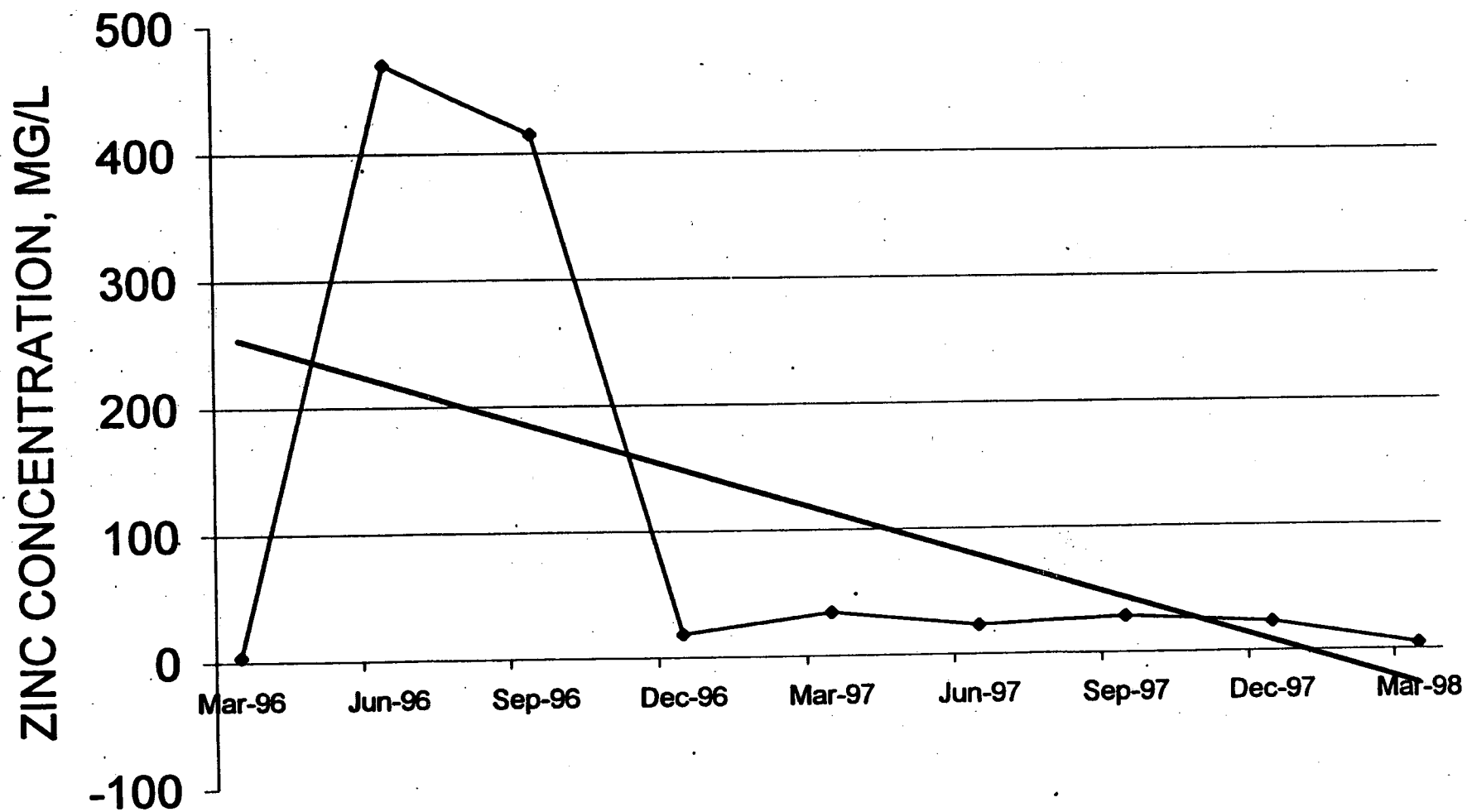
Enclosure

SW-2





SW-2



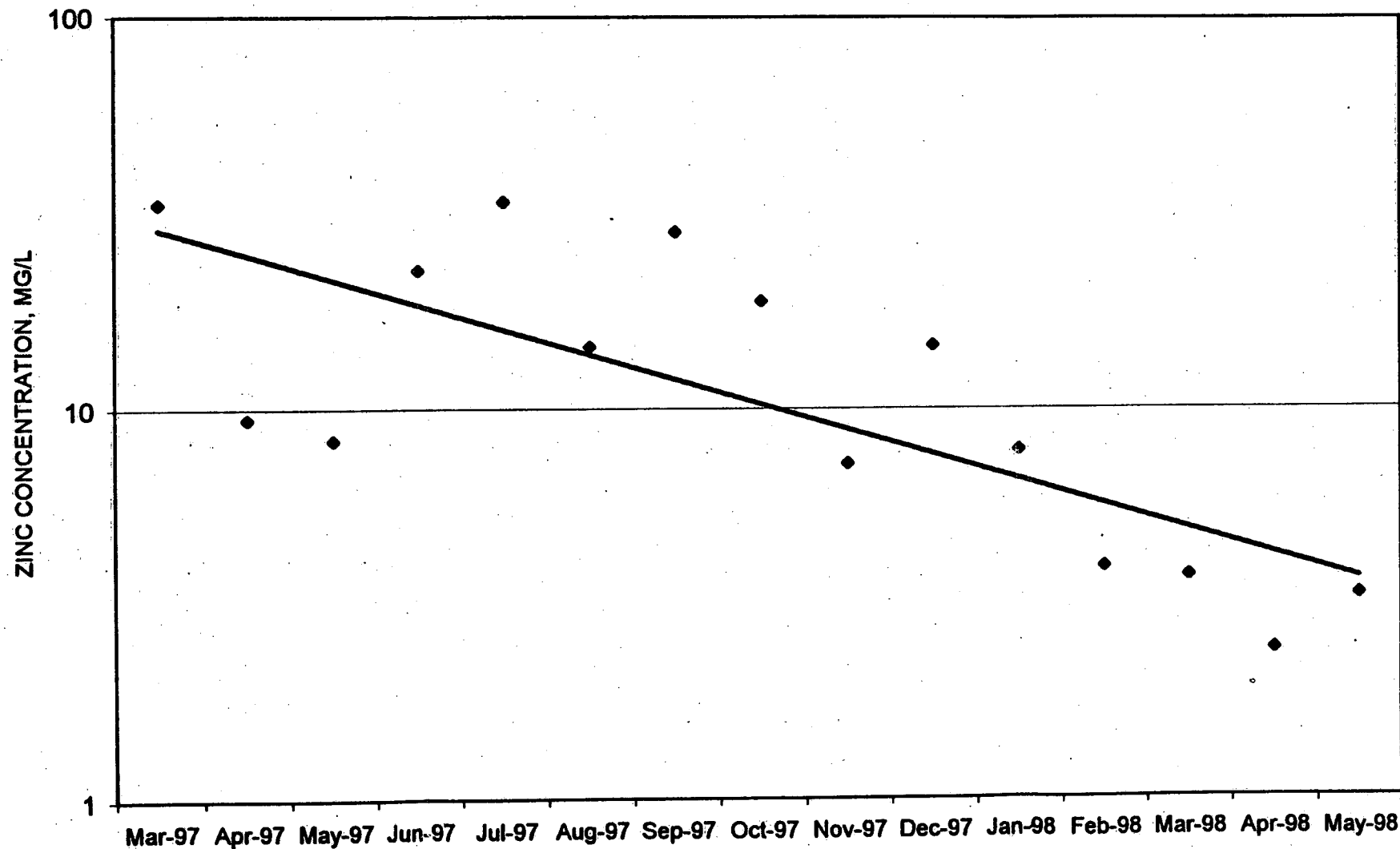
SW-2. CONCENTRATION
IN MG/L

	ZINC	NOTES
Mar-97	33.4	PMP
Apr-97	9.4	*
May-97	8.3	* AVE OF 2 SAMPLES
Jun-97	22.7	PMP
Jul-97	33.9	*
Aug-97	14.4	*
Sep-97	28.3	PMP
Oct-97	18.8	*
Nov-97	7.2	*
Dec-97	14.5	AVE OF PMP & *
Jan-98	7.8	*
Feb-98	3.9	*
Mar-98	3.7	AVE OF PMP & *
Apr-98	2.4	*
May-98	3.3	*

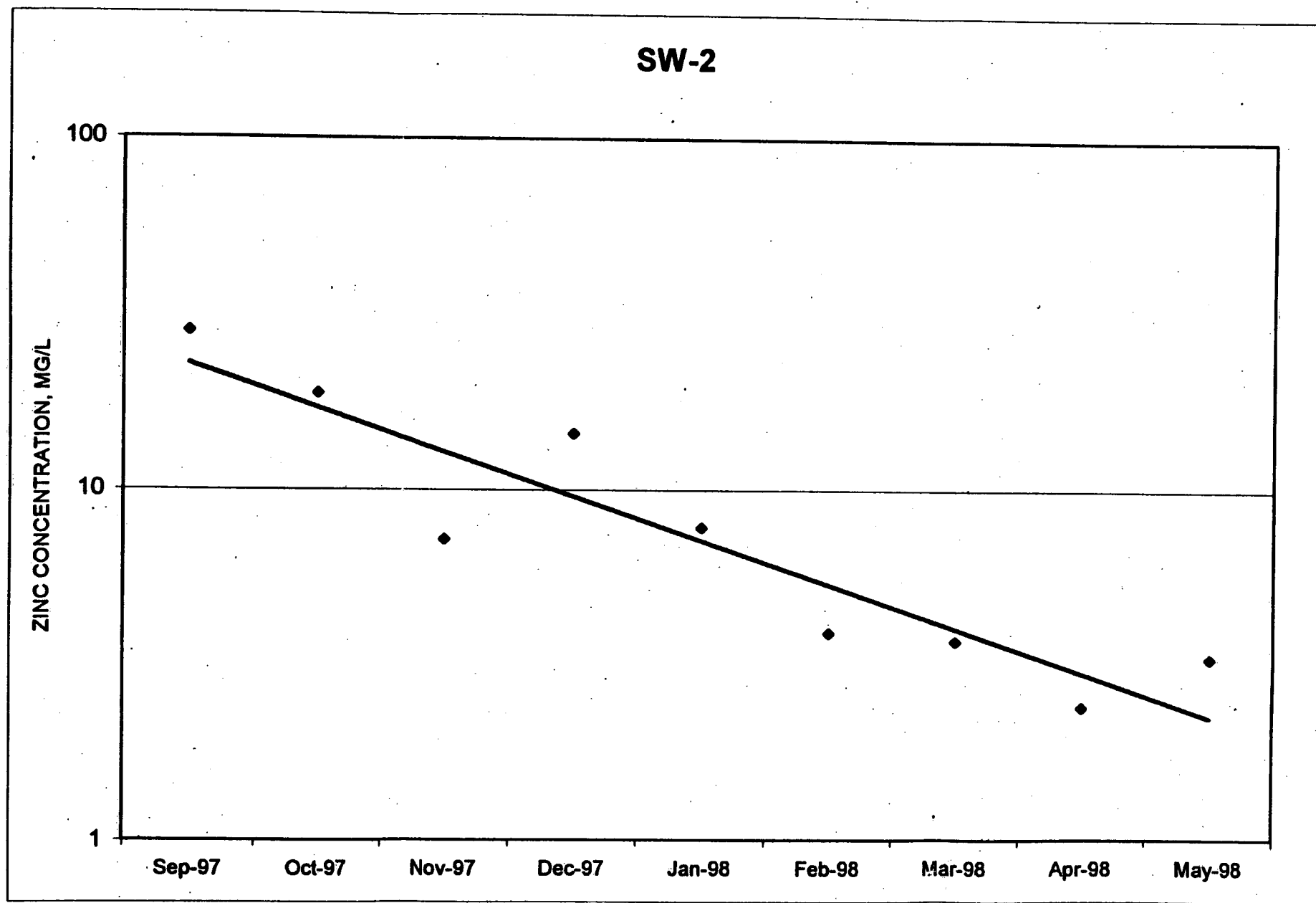
* DATA FROM MADISON MONTHLY REPORT FOR RS-1

5.

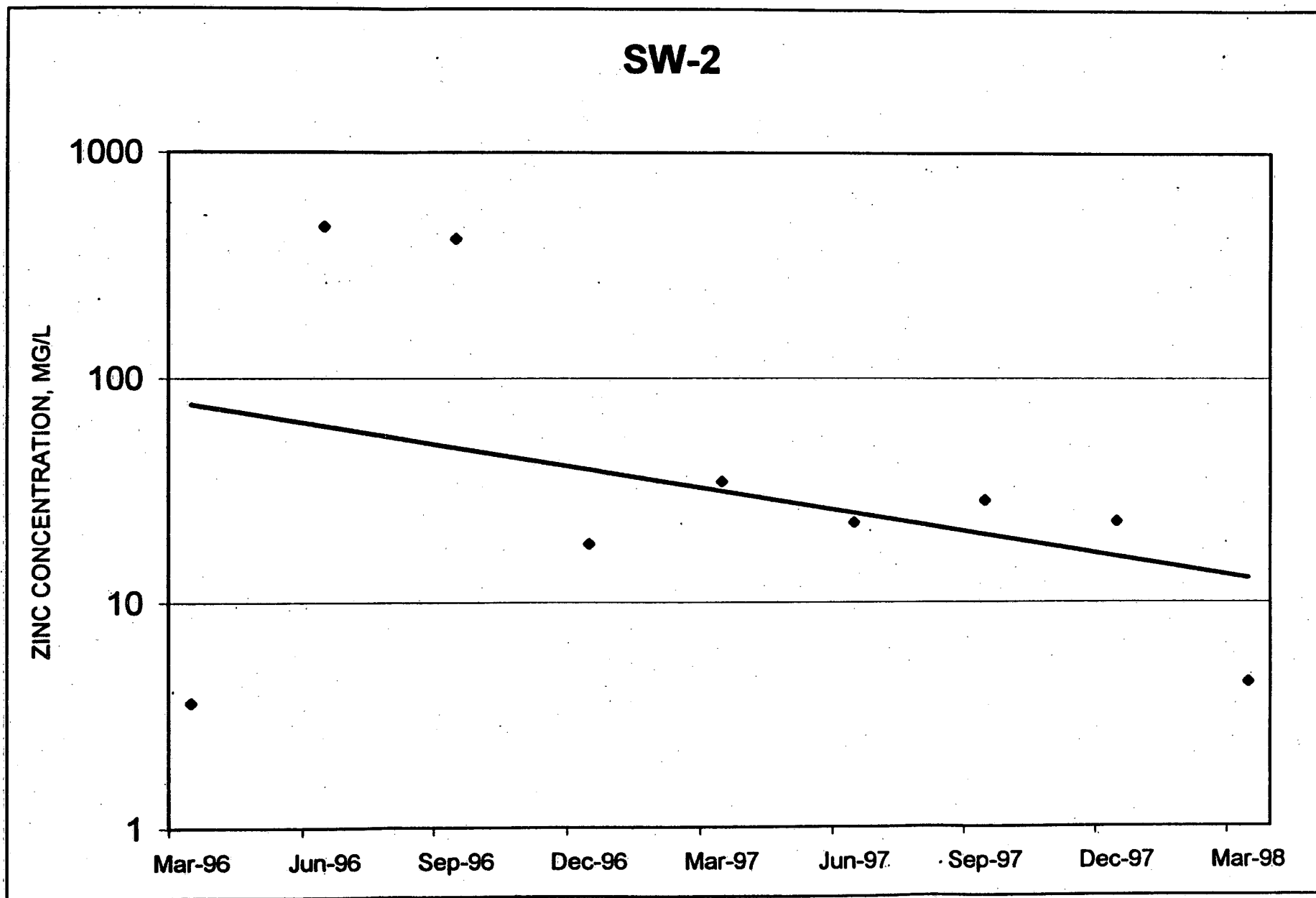
SW-2



SEMI-LOG PLOT



Semi-LOG PLOT



Semi-Log Plot